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Katherine C. Chamberlain, WSBA #40014
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5 UNITED STATES DISTRICT COURT
6 EASTERN DISTRICT OF WASHINGTON AT SPOKANE

7 K.S. by her guardian ad litem Kenneth L.
Isserlis, and DOROTHY SPIOTTA and
8 PAUL SPIOTTA,

9 Plaintiffs,

10 v.

11 AMBASSADOR PROGRAMS, INC.,
12 AMBASSADORS GROUP, INC.,
PEOPLE TO PEOPLE
INTERNATIONAL,

13 Defendants.

No. CV-08-243-RMP

DECLARATION OF KATHERINE C.
CHAMBERLAIN IN SUPPORT OF
PLAINTIFFS' COST BILL FOR
RESPONDING TO
AMBASSADORS' MOTION FOR
PROTECTIVE ORDER

14 I, KATHERINE C. CHAMBERLAIN, on oath declare as follows:

15 1. I am one of Plaintiffs' attorneys in this case.

16 2. Tim Ford is a highly experienced civil and criminal trial lawyer. Since
17 his admission to the Washington Bar 35 years ago (in 1975), he has represented
18 clients before many state and federal trial and appellate panels, including the
19 Washington Supreme Court and the United States Supreme Court. His hourly rate is
20 \$450.

21 3. I have been a practicing attorney for over 5 years, including work
22 performed in Oregon from 2004-07 and Washington since then. My hourly rate is
23 \$250.

DECLARATION OF KATHERINE C. CHAMBERLAIN IN SUPPORT
OF PLAINTIFFS' COST BILL FOR RESPONDING TO
AMBASSADORS' MOTION FOR PROTECTIVE ORDER - 1

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4. Below is a summary of the attorney fees incurred in opposing Ambassadors' Motion for Protective Order Re: Plaintiffs' Rule 30(b)(6) Deposition Notice Re: Leaders. The summary includes the work performed by attorneys Timothy K. Ford and Katherine C. Chamberlain in preparing Plaintiffs' Responsive Memorandum, Dkt. 251. Both Mr. Ford and I recorded the time we spent on opposing this motion in our time-keeping program, Provantage. The summary of time spent is based on a Provantage report. The attorney fees are calculated by multiplying the time spent by each attorney and their hourly rate.

Date	Attorney	Rate	Hours	Description of Work Performed by Attorney	Amount
2/15/10	KCC	\$250	.30	Read Ambassador's Motion for Protective Order re: 30(b)(6) on leader discipline	75.00
3/1/10	TKF	\$450	.70	Research and draft response to motion for protective order re 30b6	315.00
3/2/10	TKF	\$450	1.00	Draft and research 30b6 response	450.00
3/3/10	KCC	\$250	.60	Read/edit brief in response/opposition to Ambassador's M. for Protective Order re 30(b)(6) dep on leader discipline; Email to TF re: same	150.00
3/3/10	TKF	\$450	1.70	Research and draft opposition to motion for protective order	765.00
3/4/10	TKF	\$450	3.50	Research and draft response to 30b6 motion	1,575.00
TOTAL			7.80		\$3,330.00

1 I swear under penalty of perjury under the laws of the United States that the
2 above is true to the best of my knowledge.

3 DATED this 26th day of April, 2010.

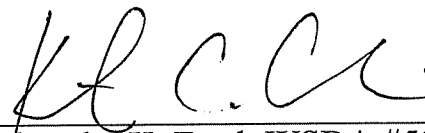
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5 By 
6 Katherine C. Chamberlain
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CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

- **Kenneth L Isserlis**
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By 
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Katherine C. Chamberlain, WSBA #40014
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